

**IN THE UNITED STATES DISTRICT COURT FOR THE  
SOUTHER DISTRICT OF NEW YORK**

JEFFREY HARRIS, derivatively on behalf of Citigroup Inc., v. CHARLES O. PRINCE, ET AL., Defendants.	1:07-cv-09841-SHS
GARY CINOTTO, derivatively on behalf of Citigroup Inc., v. CHARLES O. PRINCE, ET AL., Defendants.	1:07-cv-09900-SHS
BENJAMIN NATHANSON, derivatively on behalf of Citigroup Inc., v. CHARLES O. PRINCE, ET AL., Defendants.	1:07-cv-10333-SHS
SAM COHEN, derivatively on behalf of Citigroup Inc., v. CITIGROUP INC., ET AL., Defendants.	1:07-cv-10344-SHS
WALTER E. RYAN, JR., derivatively on behalf of Citigroup Inc., v. CHARLES O. PRINCE, ET AL., Defendants.	1:07-cv-11581-UA

**NOTICE OF MOTION AND MOTION TO CONSOLIDATE RELATED  
SHAREHOLDER DERIVATIVE ACTIONS AND APPOINT A  
LEADERSHIP STRUCTURE FOR DERIVATIVE PLAINTIFFS**

PLEASE TAKE NOTICE that Plaintiff Walter E. Ryan (“Movant”), by his counsel, will hereby move this Court on a date and such time as may be designated by the Court, at 500 Pear Street, New York, NY 10007-1312, for an Order (filed herewith): (i) consolidating the above-captioned related action for all purposes pursuant to Fed. R. Civ. P. 42(a); and (ii) appointing the law firm of Krislov & Associates, Ltd. as lead counsel and Faruqi & Faruqi, LLP as liaison counsel for Plaintiffs. In support of this Motion, Movant submits herewith the following: (i) Memorandum of Law in Support of Motion

to Consolidate Related Shareholder Derivative Action and Appoint a Leadership Structure for Derivative Plaintiffs; (i) Declaration in support thereof; and (iii) [Proposed] Order.

Dated: January 17, 2008

FARUQI & FARUQI LLP

s/Christopher Marlborough

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*Attorneys for Plaintiff Walter E. Ryan*

**CERTIFICATE OF SERVICE**

I hereby certify that on January 17, 2008, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the attached Electronic Mail Notice Lists, and I hereby certify that I have mailed the foregoing document or paper via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice Lists.

s/Christopher Marlborough

## Mailing Information for a Case 1:07-cv-09841-SHS

### Electronic Mail Notice List

The following are those who are currently on the list to receive e-mail notices for this case.

- **Thomas G. Amon**  
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### Manual Notice List

The following is the list of attorneys who are **not** on the list to receive e-mail notices for this case (who therefore require manual noticing). You may wish to use your mouse to select and copy this list into your word processing program in order to create notices or labels for these recipients.

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## Mailing Information for a Case 1:07-cv-09900-SHS

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## Mailing Information for a Case 1:07-cv-10333-SHS

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## Mailing Information for a Case 1:07-cv-10344-SHS

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## Mailing Information for a Case 1:07-cv-11581-UA

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The following are those who are currently on the list to receive e-mail notices for this case.

- **Christopher Marlborough**  
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